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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:

Alicia Jones
Fka Alicia Jacobson Jones

Debtor.

Case No. 18-32198

Chapter 7

Honorable Vincent Papalia

OPPOSITION TO APPLICATION TO RETAINER PROFESSIONAL

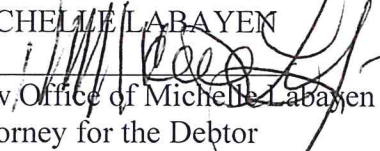
Now comes Alicia Jones, represented by the Law Office of Michelle Labayen PC as her counsel to object to the application to retain a professional.

1. On or about June 9, 2021 (ECF 135) the debtor filed a Motion to Compel Abandonment for both the 2011 Land Rover, 2007 BMW and 2008 Mercedes Benz.
2. The hearing is scheduled for July 7, 2021, therefore the trustee's request to appraise the vehicles are premature.
3. The trustee has waited nearly two years to make this request to appraise the vehicles and prejudice has attached to the delay.
4. The extended delay is a detriment to the debtor and the value of the cars due not outweigh the extreme hardship that the debtor would endure .

5. As argued before this Court by the trustee; the sale of the Debtor's residence and the withholding of the debtor's homestead exemption was to allow the debtor a full and complete discharge of any remaining debt owed to her creditors.
6. The debtor received a discharge of her debt on November 27, 2019 (ECF 117).

THEREFORE, the debtor requests that any application to retain a professional is stayed until the Motion to Compel Abandonment is heard.

June 15, 2021

MICHELLE LABAYEN
/s/ 
Law Office of Michelle Labayen
Attorney for the Debtor